

ILLINOIS
COMMERCE COMMISSIONUNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

2003 NOV 12 P 3:36

JODY D KIMBRELL

CHIEF CLERK'S OFFICE

Plaintiff

VS

Case No 03-1337

KEYPORT LIFE INSURANCE CO

a Licensed Life Insurance Co.

JACKSON NATIONAL LIFE INSURANCE

a Licensed Life Insurance Co.

A.G. EDWARDS & SONS,

a Licensed Investment Firm

BRYCE L UNRUH, a Licensed

Agent for AG Edward

NATIONAL CITY BANK, Formerly known as First of America Bank,
Cleveland, Ohio Main Branch

NATIONAL CITY BANK OF SPRINGFIELD, a licensed Lending Institution

NANCY POZO, VP, an employee of National City Bank of Springfield

TANYA GUDZENKO, an employee of National City Bank of Springfield

JOHN STINSON, President of National City Bank of Springfield

LOWELL GRIEVES, fmr Peoria Mayor previous owner of International Place Apts

MARLING MANAGEMENT local address INTERNATIONAL PLACE APTS

ROBERT MARLING owner International Place Apts

PEORIA COUNTY RECORDER OF DEEDS, Brad Horton, an elected official of
Peoria CountyDLD, INC aka DIXON, LAUKITIS, DOWNING, a licensed Title Co. and Law firm of
Illinois.

MORTON COMMUNITY BANK, a licensed financial institution

JAMES MAMER, President of Morton Community Bank

BANK ONE, a licensed financial institution

BANK ONE, Peoria, a licensed financial institution-Jefferson Branch

D. SMITH, employee of BANK ONE of Peoria-Jefferson Branch

VONCHEN, LAWLESS, TRAGER & SLEVIN, a licensed law firm

referenced to: Illinois case 99 MR 154 OBRE vs J Kimbrell Illinois Appellate 3-01-0230

10th JUDICIAL CIRCUIT OF PEORIA COUNTY 01-LM 2086, DOC 02-42301

by JUDGE JOSEPH VESPA

OFFICE OF BANKS & REAL ESTATE, State of Illinois Agency

ILLINOIS AMERICAN WATER CO, a public utility company

MARY SULLIVAN, attorney for Illinois American Water

Defendants

COMPLAINT

Forgery, Conspiracy to Commit Forgery, Deceptive Practice by an employee of a Licensed Financial Institution, Deceptive Practice by an employee of a Licensed Insurance Co., Forgery by a Licensed Agent of a Licensed Insurance Co., Actions that include Elderly Abuse. Violation of National and Illinois Lending Laws; Falsification of Deeds, Land Fraud, Conspiracy to Commit Land Fraud.

NOW comes the Plaintiff, JODY D KIMBRELL, and states as follows:

address: 714 S Eddlemon Rd
Hanna City, IL 61536

Defendant: KEYPORT LIFE INSURANCE CO
PO Box 9133
Wellesley, MA 02481

Defendant JACKSON NATIONAL LIFE INSURANCE
1 800 644-4565
PO Box 24068
Lansing, Michigan 48909

Defendant: AG EDWARDS	AG Edwards
One North Jefferson	6810 N Knoxville
St. Louis, MO 63103	Peoria, IL 61614
Clay L Grumke, V Pres	Tom Hendrichs, Manager
314 955-3000	

Defendant: an Agent of the above companies:
and who represented Helen G Blair (deceased) as her agent
and had received monetary benefit from the actions he was involved in
concerning her estate,
BRYCE L UNRUH
business office: 6810 N Knoxville
Peoria, IL 61614

Defendant: NATIONAL CITY BANK
CLEVELAND MAIN BRANCH
1900 E Ninth St.
Cleveland, Ohio 44114
(216) 222-3000

Defendant: NATIONAL CITY BANK OF SPRINGFIELD
One Old Capital North
Springfield, IL 62701

Defendant: Nancy Pozo, VP National City Bank of Springfield
One Old Capital North
Springfield, IL 62701

Defendant: Tanya Gudzenko, employee of National City Bank of Springfield]
One Old Capitol North
Springfield, IL 62701

Defendant: John Stinson, President
National City Bank of Springfield
One Old Capital North
Springfield, IL 62701

Defendant: Lowell (Bud)Grievess fmr Mayor-Peoria, Prev owner International Place Apts
RT 24
Canton, IL 61520

Defendant: Marling Management, Peoria address
International Place Apts, Limited Partnership
6500 N University 135 N Greenleaf
Peoria, IL 61614 Gurnee, IL 60031
Business office fax: 1 847 816-8077

Defendant: Robert Marling, owner International Place Apts
International Place Apts, Limited Partnership
6500 N University 101 Ambrogio Dr. Unit 3
Peoria, IL 61614 Gurnee, IL 60031
business fax: 1 847 816-8077

Defendant: Bank One, Office of the Chairman
Mail Code AZ1-2526
PO Box 1762
Chicago, IL 60690
Angela M Parks, Off of the Chairman
1 800 814-5507

Defendant: Bank One Jefferson Branch-Peoria
124 SW Adams
Peoria, IL 61602

Defendant: D. Smith employee of Bank One
124 SW Adams
Peoria, IL 61602

Defendant: BRAD Horton, Peoria County Recorder of Deeds
Peoria County Court House
Peoria, IL 61602

Defendant: Morton Community Bank, a financial institution
721 W Jackson
Morton, IL

Defendant: Jim Mamer, President Morton Community Bank
721 W Jackson
Morton, IL

Defendant: DLD, Inc. AKA DIXON, LAUKITUS & DOWNING
416 Main St. suite 711
Peoria, IL 61602

Defendant: Vonchen, Lawless, Trager & Slevin
456 Fulton St suite 425
Peoria, IL 61602

Defendant: 10th Judicial Circuit of Peoria County by Judge Joseph Vespa
Peoria County Courthouse
Peoria, IL 61602

Defendant: Office of Banks & Real Estate-Appraisal Div
310 S Michigan suite 2130
Chicago, IL 60604

Defendant: Illinois American Water, a public utility company
300 No Waterworks Dr.
Belleville, IL 62223
Mary Sullivan, counsel 618 236-1180

Litigation History:

A

case 99-CH 393 Peoria County history of deception that was condoned by National City Bank formerly known as FIRST OF AMERICA Bank, when in 1988, by an employee of the PEORIA COUNTY RECORDER OF DEEDS office a falsified deed was recorded by Lowell Grieves & John Tintoff to acquire land and in conjunction with the STATE of ILLINOIS installing a tax-payer funded drive-way across said land so the property know as International Place Apartment & Gaslight Apartments could front the

newly finished University St. NATIONAL CITY BANK then known as FIRST OF AMERICA Bank, by their President Robert Stevenson placed a mortgage on said property, using the falsified deed that had been recorded by an employee of the PEORIA COUNTY RECORDERS OFFICE. Then said Property was sold to MARLING MANAGEMENT of Chicago, with an increased value, of \$1 million, using the falsified legal to now front University St. At the same time GASLIGHT refinanced their mortgage, with a now \$4 million value, because of the new frontage. Marling Management does business through NATIONAL CITY BANK of Springfield, NANCY POZO. DLD, INC., who done the title work & had re-recorded the our mortgage was also affiliated with the attorney for LOWELL GRIEVE'S son, GREGORY HUNZINKER. DLD, Inc also did the TITLE for MORTON COMMUNITY Bank, a financial also affiliated with MARLING MANAGEMENT, by an apt. complex located in Morton.

Illinois case 99 MR 154 OBRE vs J Kimbrell Illinois Appellate 3-01-0230

This case entailed AFTER I filed claim of ownership, my appraisal license was revoked by the Board of Appraisal Review. HAROLD TURLEY was on the board, he was also the APPRAISER when Marling Management purchased International Place Apts from LOWELL GRIEVES and "overlooked" the fact the LEGAL had been changed so the property fronted N University St. A construed plat, falsified deeds and changed tax records were also overlooked. I filed an appeal case (Dean Poignant-who was sanctioned) then Steve Ferlman (Vonchen Law Firm-who left town and Vonchen Law Firm withdrew) under Judge Joseph Vespa 9 months AFTER withdrawing and NO contact Vonchen, etal vs Jody Kimbrell 01-LM 2086 claiming they were owed legal fees, even though they withdrew agreeing to being paid in full I paid for a Jury trial was denied and notice was never sent so I could appeal instead Judge Vespa granted the filing of doc 02-42301 judgment and I did not even know it till I refinanced my home.

NATIONAL CITY has filed foreclosure papers -- 03 CH 460

Foreclosure filed against defendants Michael Kimbrell, Jody Kimbrell Anna Isaacs and Kimbrell Realty, Inc. which INCLUDED lots that were NOT included on the original mortgage BUT added on 2-12-03 without NOTICE or permission of the owners.

Pending litigation: Illinois Commerce Commission Kimbrell Realty vs Illinois American Water 03-0304 Illinois American Water MOVED the installation of a hydrant onto private land to aid the illegal installation of a driveway, across private property and to endorse the "new" frontage, using false legal description and providing water access from University St.

Witnesses: Documents as submitted; Identification of parties involved and have been notified of the infractions; Illinois State's Attorney Kevin Lyons Peoria County Recorder Deeds Brad Horton Laurie Judd attorney for National City Bank, copies of her correspondence-first a settlement offer then after receiving notice of another bank working to refinance, her letter filing foreclosure to stop it.

Bank One notice to them of the forgery that was done through their financial institution.

ILLINOIS
COMMERCE COMMISSION
JAN 12 P 3:29
RECEIVED

STATEMENT OF CLAIM

Place of Occurrence: Land was vacated in 1982 and employees of the Peoria Co. Records office hid the documents so the State Taxpayers would pay for the illegal driveway. The false Legal was recorded Aug 1988. The mortgage done by National City formerly known as First of America bank, by their President Robert Stevenson was done September 1988. Marling Management purchased the property 3 months later, their Title Co. Chicago Title overlooked the false legal, used a survey by AUSTIN Engineers, who worked for PEORIA County and GASLIGHT Apartments, keeping it un-recorded till the 20 year adverse possession could be used to claim the lost land. 1982-2002. I claimed the land in 1998 causing Case 99-CH 393 which did result in a settlement. In August 2001 I closed the mortgage with National City Bank of Springfield and who I had been referred to by MARLING Management. NATIONAL CITY Bank filed an European Style Mortgage and for 1 year they bounced our mortgage payment, took funds from our account and when I tried to refinance it, they enforced a claim of a pre-payment penalty causing us not to get the loan. DLD, INC. then re-recorded the mortgage adding two commercial lots that were not part of the collateral, stopping me from using them to get funds to stop the actions of NATIONAL CITY of foreclosing on my property. The documents have been attached that show the dishonest & deceptive means the employees of National City of Springfield chose to do. Their misrepresentation, unethical behavior and violation of lending laws caused the situation I am in. The entire mess was caused by people wanting to cover up illegal behavior and instead of correcting the deceit, they chose to attack me. I have attached all of the documents for this court to review and to choose the consequences that would give me the justice I seek.

KEYPORT INSURANCE, JACKSON NATIONAL LIFE, AG EDWARDS and their agent BRYCE UNRUH allowed Forged documents to be submitted by Susan Zimmerman, allowing her access to HELEN BLAIR'S accounts, receiving monetary gain by their agent Bryce Unruh, accepting forged beneficiary changes and application from their agent and allowing access for her accounts to be compromised and finally taken. This action resulted in my losing the funds that would have saved my business. HELEN G BLAIR, ret PEORIA CO RECORDER OF DEEDS(dec) Held office till 1988 FRIEDA ZIMMERMAN fmr Deputy Recorder and the employee who recorded the falsified deeds. Her daughter SUSAN BOHM (Helen Blair's niece) is who forged Helen Blair's accounts. These parties were "suddenly" added to Helen G Blair's will in 1990.

RELIEF REQUESTED

FROM NATIONAL CITY BANK \$4 million compensation for the pain & suffering I endured for the misrepresentations, unethical behavior, slander(filing public notice of foreclosure, naming property NOT included in the mortgage) deception and violation of Lending laws by their employees, NANCY POZO and TANYA GUDZENKO,

NATIONAL CITY Bank of Springfield, with the knowledge of JOHN STINSON, President of National City Bank of Springfield
Release of my savings & checking account held by NATIONAL CITY BANK
acceptance of \$2,225,259.00 release of my mortgage, vacation of the foreclosure filed against my property as partial compensation will be accepted.

DLD, INC aka DIXON, LAUKITUS & DOWNING \$1 million compensation
MORTON COMMUNITY BANK & President JIM MAMER (Title Policy) -- \$38,000.
compensation for the pain & suffering I endured for the misrepresentation, unethical behavior, violation of lending laws and deliberate acts in conjunction with association with the falsification of deeds of said property known as Jeth Ct and re-recording a mortgage adding lots WITHOUT permission of owners.

BANK ONE, BANK ONE of PEORIA, D. SMITH \$3 million compensation for the pain & suffering I endured for the misrepresentation, violation of lending laws, and failure to follow proper procedure to protect client's accounts when they allowed forged documents to be submitted on an Elderly Client's accounts, which resulted them to be compromised and taken by someone she had not authorized.

VONCHEN, LAWLESS, TRAGER & SLEVIN \$5,610,000. compensation for the pain and suffering I endured when they chose deceit and dishonesty before JUDGE JOSEPH VESPA & 10th JUDICIAL COURT OF PEORIA COUNTY. 99 MR 154 Attorney left town and Vonchen Law Firm withdrew from the case, as paid in full 9 months later Vonchen Law Firm filed case 01-LM 2086 I had paid for a JURY trial which was denied Vonchen Law firm DID NOT send any notice so I could appeal the decision and they were granted a judgment DOC 02-42301 against my property. It was this action that caused me to REQUEST this court to BLOCK case 03 CH 460 by NATIONAL CITY BANK vs Jody Kimbrell, et al and remove case to Federal Jurisdiction National City Bank has been named as a Defendant, in 03-1337

OFFICE OF BANKS & REAL ESTATE Return of my appraisal license The party, Larry Bullock retired but it was his involvement and cooperation with HAROLD TURLEY that my license was revoked. The corruption involved is not being presented BUT a suggestion to OBRE to review the case to bring the guilty to justice would be a plus for Illinois citizens. The parties involved have brought a lot of grief to individuals using their deceitful and unethical methods of doing business.

KEYPORT LIFE INSURANCE, JACKSON NATIONAL LIFE INSURANCE, AG EDWARDS and BRYCE UNRUH, agent -- \$3 million compensation for the actions of their employee, first to accept forged documents, changing the beneficiaries of a client without notarized verification, then transferring funds, accepting a forged application, taking monetary gain from the transaction and allowing the loss of funds on an Elderly Client's accounts..

LOWELL GRIEVES, fmr Mayor of Peoria, previous owner of International Place Apts, MARLING MANAGMENT, ROBERT MARLING, current owner of International Place Apts, ILLINOIS AMERICAN WATER(aiding the illegal installation of a driveway and providing water access from University St.) -- \$4 million compensation, returned to the TAXPAYERS of Peoria, Peoria County for the acts of falsification of deeds to acquire access to University St. by filing a false deed through the Peoria County Recorder of Deeds office, to increase value of said property, by acquiring a tainted mortgage through First of America Bank @NATIONAL CITY BANK by their president ROBERT STEVENSON (deceased), changing tax records, acquiring a mortgage (LaSalle Bank of Chicago--Marling Management) using falsified documents, and appraisal by HAROLD TURLEY--who was on BD OF APPRAISAL REVIEW--OBRE- 99-MR 154 & Appellate 03-01-0230

.PEORIA COUNTY RECORDER OF DEEDS Peoria County This office was compromised by unscrupulous people who chose to abuse the law first by defrauding the taxpayers, then by employees seeking recognition and compensation. When one records a legal one expects the integrity of the individuals to be honest. The person who aided the deceit is deceased. Frieda Zimmerman, Susan Bohm's mother chose to corrupt the integrity of the Recorder's office. The only thing I seek from them is justice for the pain & suffering I endured from the actions of the employees who chose deceit over honesty. I would appreciate their recognition of me for bringing this matter to their attention and their pursuit of correcting the corruption I uncovered in their office.

JURY DEMAND YES

Signed this 10 day of November, in the year of our Lord 2003


Jody D Kimbrell

Jody Kimbrell
714 S Eddlemon Rd
Hanna City, IL 61536
309 691-6100